

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA**

**DOCKET NO. 2019-1-E**

In the Matter of	)	
Annual Review of Base Rates	)	<b>DIRECT TESTIMONY OF</b>
for Fuel Costs for	)	<b>BRETT PHIPPS FOR</b>
Duke Energy Progress, LLC	)	<b>DUKE ENERGY PROGRESS, LLC</b>

---

1     **Q.     PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2     A.     My name is Brett Phipps. My business address is 526 South Church Street, Charlotte,  
3             North Carolina 28202.

4     **Q.     BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

5     A.     I am employed as Managing Director, Fuel Procurement, for Duke Energy  
6             Corporation ("Duke Energy"). In that capacity, I directly manage the organization  
7             responsible for the purchase and delivery of coal and natural gas to Duke Energy's  
8             regulated generation fleet, including Duke Energy Progress, LLC ("Duke Energy  
9             Progress," "DEP," or the "Company") and Duke Energy Carolinas, LLC ("DEC")  
10            (collectively, the "Utilities," or the "Companies"). In addition to fuels, I also supervise  
11            the procurement of all reagents.

12    **Q.     PLEASE BRIEFLY SUMMARIZE YOUR EDUCATIONAL AND**  
13    **PROFESSIONAL EXPERIENCE.**

14    A.     I have a Bachelor of Science degree in Chemistry from Marshall University. I began  
15             in the mining industry in 1993 where I held various roles associated with surface  
16             mining operations. I joined Progress Energy in 1999, holding roles in terminal  
17             operations and sales and marketing for the unregulated business. I transitioned to the  
18             regulated utility in 2005 where I worked in various fuels procurement functions and  
19             leadership roles. I joined Duke Energy in July 2012 and am currently Managing  
20             Director, Fuels Procurement. I am on the Board of Directors of the American Coal  
21             Council, and am a member of the The Coal Institute, the Lexington Coal Exchange,  
22             Southern Gas Association, and the American Gas Association.

1     **Q.     HAVE YOU TESTIFIED BEFORE THIS COMMISSION IN ANY PRIOR**  
2     **PROCEEDINGS?**

3     A.     Yes. I testified before the Public Service Commission of South Carolina (“PSCSC”  
4           or “Commission”) in DEP’s 2017 fuel and environmental cost proceeding in Docket  
5           No. 2017-1-E and DEC’s 2017 fuel and environmental cost proceeding in Docket No.  
6           2017-3-E.

7     **Q.     WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS**  
8     **PROCEEDING?**

9     A.     The purpose of my testimony is to describe DEP’s fossil fuel purchasing practices,  
10          provide actual fossil fuel costs for the period March 1, 2018 through February 28,  
11          2019 (“review period”) versus March 1, 2017 through February 28, 2018 (“prior  
12          review period”), and describe changes forthcoming for the period July 1, 2019 through  
13          June 30, 2020 (“billing period”).

14    **Q.     YOUR TESTIMONY INCLUDES TWO EXHIBITS. WERE THESE**  
15    **EXHIBITS PREPARED BY YOU OR AT YOUR DIRECTION AND UNDER**  
16    **YOUR SUPERVISION?**

17    A.     Yes. These exhibits were prepared at my direction and under my supervision, and  
18          consist of Phipps Exhibit 1, which summarizes the Company’s Fossil Fuel  
19          Procurement Practices, and Phipps Exhibit 2, which summarizes total monthly natural  
20          gas purchases and monthly contract and spot coal purchases during the review period  
21          and the prior review period.

22

1    **Q.    PLEASE PROVIDE A SUMMARY OF DEP’S FOSSIL FUEL**  
2    **PROCUREMENT PRACTICES.**

3    A.    A summary of the Company’s fossil fuel procurement practices is set out in Phipps  
4    Exhibit 1.

5    **Q.    HOW DOES THE COMPANY OPERATE ITS PORTFOLIO OF**  
6    **GENERATION ASSETS TO RELIABLY AND ECONOMICALLY SERVE**  
7    **ITS CUSTOMERS?**

8    A.    Both DEP and DEC utilize the same process to ensure that the assets of the Companies  
9    are reliably and economically available to serve their respective customers. To that  
10   end, both companies consider factors that include, but are not limited to, the latest  
11   forecasted fuel prices, transportation rates, planned maintenance and refueling outages  
12   at the generating units, generating unit performance parameters, and expected market  
13   conditions associated with power purchases and off-system sales opportunities in  
14   order to determine the most economic and reliable means of serving their customers.

15   **Q.    PLEASE DESCRIBE THE COMPANY’S DELIVERED COST OF COAL**  
16   **AND NATURAL GAS DURING THE REVIEW PERIOD.**

17   A.    The Company’s average delivered cost of coal per ton for the review period was  
18   \$84.87 per ton, compared to \$80.89 per ton in the prior review period, representing an  
19   increase of approximately 5%. This includes an average transportation cost of \$33.36  
20   per ton in the review period, compared to \$29.36 per ton in the prior review period,  
21   representing an increase of approximately 14%. The Company’s average price of gas  
22   purchased for the review period was \$4.02 per Million British Thermal Units  
23   (“MBtu”), compared to \$4.70 per MBtu in the prior review period, representing a

1 decrease of 14%. The cost of gas is inclusive of gas supply, transportation, storage  
2 and financial hedging.

3 DEP's coal burn for the review period was 3.6 million tons, compared to a  
4 coal burn of 4.0 million tons in the prior review period, representing a decline of 11%.  
5 The Company's natural gas burn for the review period was 185.5 million MBtu  
6 compared to a gas burn of 168.3 million MBtu in the prior review period, representing  
7 an increase of 10%. The primary contributing factors were changes in (1) weather  
8 driven demand, and (2) commodity prices.

9 **Q. PLEASE DESCRIBE THE LATEST TRENDS IN COAL AND NATURAL**  
10 **GAS MARKET CONDITIONS.**

11 A. Coal markets continue to be in a state of flux due to a number of factors, including:  
12 (1) uncertainty around proposed, imposed, and stayed U.S. Environmental Protection  
13 Agency ("EPA") regulations for power plants; (2) continued abundant natural gas  
14 supply and storage resulting in lower natural gas prices, which has lowered overall  
15 domestic coal demand; (3) strong global market demand for both steam and  
16 metallurgical coal; (4) uncertainty surrounding regulations for mining operations; and  
17 (5) tightening supply as bankruptcies, consolidations and company reorganizations  
18 have allowed coal suppliers to restructure and settle into new, lower on-going  
19 production levels.

20 With respect to natural gas, the nation's natural gas supply has grown  
21 significantly over the last several years and producers continue to enhance production  
22 techniques, increase efficiencies, and lower production costs. Natural gas prices are  
23 reflective of the dynamics between supply and demand factors, and in the short term,

1 such dynamics are influenced primarily by seasonal weather demand and overall  
2 storage inventory balances. In addition, there continues to be growth in the natural  
3 gas pipeline infrastructure needed to serve increased market demand. However,  
4 pipeline infrastructure permitting and regulatory process approval efforts are taking  
5 longer due to increased reviews and interventions, which can delay and change  
6 planned pipeline construction and commissioning timing.

7 Over the longer term planning horizon, natural gas supply is projected to  
8 continue to increase along with the needed pipeline infrastructure to move the growing  
9 supply to meet demand related to power generation, liquefied natural gas exports and  
10 pipeline exports to Mexico.

11 **Q. WHAT ARE THE PROJECTED COAL AND NATURAL GAS**  
12 **CONSUMPTIONS AND COSTS FOR THE BILLING PERIOD?**

13 A. DEP's current coal burn projection for the billing period is 5.0 million tons compared  
14 to 3.6 million tons consumed during the review period. DEP's billing period  
15 projections for coal generation may be impacted due to changes from, but not limited  
16 to, the following factors: (1) delivered natural gas prices versus the average delivered  
17 cost of coal; (2) volatile power prices; and (3) electric demand. Combining coal and  
18 transportation costs, DEP projects average delivered coal costs of approximately  
19 \$66.88 per ton for the billing period compared to \$84.87 per ton in the review period.  
20 The lower projected cost is due, in part, to newly negotiated rail transportation  
21 contracts that went into effect March 1, 2019. This projected delivered cost, however,  
22 is subject to change based on, but not limited to, the following factors: (1) exposure  
23 to market prices and their impact on open coal positions; (2) the amount of non-

1 Central Appalachian coal DEP is able to consume; (3) performance of contract  
2 deliveries by suppliers and railroads which may not occur despite DEP's strong  
3 contract compliance monitoring process; (4) changes in transportation rates; and (5)  
4 potential additional costs associated with suppliers' compliance with legal and  
5 statutory changes, the effects of which can be passed on through coal contracts.

6 DEP's current natural gas burn projection for the billing period is  
7 approximately 151.4 million MBtu, which is a decrease from the 185.5 million MBtu  
8 consumed during the review period. The current average forward Henry Hub price for  
9 the billing period is \$2.92 per million MBtu compared to \$3.10 per million MBtu in  
10 the review period. Projected natural gas burn volumes will vary based on factors such  
11 as, but not limited to, changes in actual delivered fuel costs and weather driven  
12 demand.

13 **Q. WHAT STEPS IS DEP TAKING TO MANAGE PORTFOLIO FUEL COSTS?**

14 A. The Company continues to maintain a comprehensive coal and natural gas  
15 procurement strategy that has proven successful over the years in limiting average  
16 annual fuel price changes while actively managing the dynamic demands of its fossil  
17 fuel generation fleet in a reliable and cost effective manner. With respect to coal  
18 procurement, the Company's procurement strategy includes (1) having an appropriate  
19 mix of contract and spot purchases for coal; (2) staggering coal contract expirations  
20 in order to limit exposure to market price changes; and (3) diversifying coal sourcing  
21 as economics warrant, as well as working with coal suppliers to incorporate additional  
22 flexibility into their supply contracts. The Company conducts spot market solicitations  
23 throughout the year to supplement term contract purchases, taking into account

1 changes in projected coal burns and existing coal inventory levels.

2 The Company has implemented natural gas procurement practices that include  
3 periodic Request for Proposals and shorter-term market engagement activities to  
4 procure and actively manage a reliable, flexible, diverse, and competitively priced  
5 natural gas supply. These procurement practices include contracting for volumetric  
6 optionality in order to provide flexibility in responding to changes in forecasted fuel  
7 consumption. Lastly, DEP continues to maintain a short-term natural gas hedging plan  
8 to manage fuel cost risk for customers via a disciplined, structured execution  
9 approach. DEP continues to monitor and make adjustments as necessary to its natural  
10 gas hedging program.

11 **Q. DOES THIS CONCLUDE YOUR PRE-FILED DIRECT TESTIMONY?**

12 **A.** Yes, it does.



## **Duke Energy Process, LLC Fossil Fuel Procurement Practices**

### **Coal**

- Near and long-term coal consumption is forecasted based on inputs such as load projections, fleet maintenance and availability schedules, coal quality and cost, environmental permit and emissions considerations, projected renewable capacity, and wholesale energy imports and exports.
- Station and system inventory targets are developed to provide reliability, insulation from short-term market volatility, and sensitivity to evolving coal production and transportation conditions. Inventories are monitored continuously.
- On a continuous basis, existing purchase commitments are compared with consumption and inventory requirements to determine additional needs.
- All qualified suppliers are invited to participate in proposals to satisfy additional or contract needs.
- Spot market solicitations are conducted on an on-going basis to supplement contract purchases.
- Contracts are awarded based on the lowest evaluated offer, considering factors such as price, quality, transportation, reliability and flexibility.
- Delivered coal volume and quality are monitored against contract commitments. Coal and freight payments are calculated based on certified scale weights and coal quality analysis meeting ASTM standards as established by ASTM International.

### **Gas**

- Near and long-term natural gas consumption is forecasted based on inputs such as load projections, commodity and emission prices, projected renewable capacity, and fleet maintenance and availability schedules.
- Physical procurement targets are developed to procure a cost effective and reliable natural gas supply.
- Over time, short-term and long-term Requests for Proposals and market solicitations are conducted with potential suppliers to procure the cost competitive, secure, and reliable natural gas supply, firm transportation, and storage capacity needed to meet forecasted gas usage.
- Short-term and spot purchases are conducted on an on-going basis to supplement term natural gas supply.
- On a continuous basis, existing purchases are compared against forecasted gas usage to ascertain additional needs.
- Natural gas transportation for the generation fleet is obtained through a mix of long term firm transportation agreements, and shorter term pipeline capacity purchases.
- A targeted percentage of the natural gas fuel price exposure is managed via a rolling 36-month structured financial natural gas hedging program.
- Through the Asset Management and Delivered Supply Agreement between Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC implemented on January 1, 2103, DEC serves as the designated Asset Manager that procures and manages the combined gas supply needs for the combined Carolinas gas fleet.

**Fuel Oil**

- No. 2 fuel oil is burned primarily for initiation of coal combustion (light-off at steam plants) and in combustion turbines (peaking assets).
- All No. 2 fuel oil is moved via pipeline to applicable terminals where it is then loaded on trucks for delivery into the Company's storage tanks. Because oil usage is highly variable, the Company relies on a combination of inventory, responsive suppliers with access to multiple terminals, and trucking agreements to manage its needs. Replenishment of No. 2 fuel oil inventories at the applicable plant facilities is done on an "as needed basis" and coordinated between fuel procurement and station personnel.
- Formal solicitations for supply may be conducted as needed with an emphasis on maintaining a network of reliable suppliers at a competitive market price in the region of our generating assets.

DUKE ENERGY PROGRESS  
Summary of Coal Purchases  
Twelve Months Ended February 2019 & 2018  
Tons

<u>Line No.</u>	<u>Month</u>	<u>Contract (Tons)</u>	<u>Net Spot Purchase and Sales (Tons)</u>	<u>Total (Tons)</u>
1	March 2018	260,526	326	260,852
2	April	250,213	0	250,213
3	May	229,852	0	229,852
4	June	170,145	0	170,145
5	July	281,312	25,688	307,000
6	August	316,012	24,850	340,862
7	September	280,066	74,767	354,833
8	October	230,500	83,019	313,519
9	November	166,986	74,178	241,164
10	December	60,781	259,086	319,867
11	January 2019	148,089	170,562	318,651
12	February	314,006	25,352	339,358
<b>13</b>	<b>Total (Sum L1:L12)</b>	<b>2,708,488</b>	<b>737,828</b>	<b>3,446,316</b>

<u>Line No.</u>	<u>Month</u>	<u>Contract (Tons)</u>	<u>Net Spot Purchase and Sales (Tons)</u>	<u>Total (Tons)</u>
14	March 2017	191,908	13,396	205,304
15	April	223,875	0	223,875
16	May	224,952	0	224,952
17	June	238,854	12,264	251,118
18	July	320,213	0	320,213
19	August	430,436	0	430,436
20	September	346,651	0	346,651
21	October	325,000	0	325,000
22	November	324,889	0	324,889
23	December	229,150	0	229,150
24	January 2018	212,233	0	212,233
25	February	235,368	0	235,368
<b>26</b>	<b>Total (Sum L14:L25)</b>	<b>3,303,529</b>	<b>25,660</b>	<b>3,329,189</b>

DUKE ENERGY PROGRESS  
Summary of Gas Purchases  
Twelve Months Ended February 2019 & 2018  
MBTUs

<u>Line</u> <u>No.</u>	<u>Month</u>	<u>MBTUs</u>
1	March 2018	13,375,182
2	April	13,994,322
3	May	15,986,353
4	June	11,053,613
5	July	12,806,726
6	August	15,479,769
7	September	20,299,371
8	October	19,387,566
9	November	17,128,278
10	December	16,867,758
11	January 2019	14,807,040
12	February	14,345,919
<b>13</b>	<b>Total (Sum L1:L12)</b>	<b>185,531,897</b>

<u>Line</u> <u>No.</u>	<u>Month</u>	<u>MBTUs</u>
14	March 2017	14,884,889
15	April	11,260,572
16	May	11,466,510
17	June	13,517,327
18	July	15,763,956
19	August	15,138,794
20	September	13,928,655
21	October	12,729,705
22	November	14,540,861
23	December	16,817,106
24	January 2018	14,446,004
25	February	13,775,980
<b>26</b>	<b>Total (Sum L14:L25)</b>	<b>168,270,359</b>